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Marianne Lamont Horinko, Acting Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

E-mail: chem.rtk@epa.gov; oppt.ncic@epa.gov

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Attention: Chemicals Right-to Know Program

RE: Submittal of Information for the HPV Program
Submittal of Revised Robust Summaries and Revised Test Plan for CAS No. 10595-60-5

Dear Ms. Horinko:

PPG Industries, Inc. and Air Products and Chemicals are resubmitting the Robust Summaries and Test Plan for Diethylenetriamine, 1,7-bis-(1,3-dimethylbutylidene) (CAS No. 10595-60-5) due to revisions we made in the Robust Summaries and Test Plan. Please post the resubmitted Test Plan and Robust Summaries on the EPA HPV website.

We have reviewed the comments posted to the website concerning our prior submissions, and considered the various suggestions contained in the comments. We have subsequently revised the Test Plan and incorporated responses to the comments in the Test Plan.

The HPV Test Plan has been revised to address the following issues raised in the comments:

1. *Rationale for basing the hazard profile for Diethylenetriamine, 1,7-bis-(1,3-dimethylbutylidene) (CAS No. 10595-60-5) on data for the hydrolysis products diethylenetriamine (DETA) and methyl isobutyl ketone (MIBK).*

As shown by data in the Robust Summaries and Test Plan, Diethylenetriamine, 1,7-bis-(1,3-dimethylbutylidene) is rapidly hydrolyzed to form DETA and MIBK. Our Test Plan is based on the premise that the hazard profile for this material can be based on the data for these two materials. One set of comments supported this premise. However, one comment suggested no rationale was presented to show that data from separate studies of DETA and MIBK would be representative of the toxicity of a mixture of DETA/MIBK. However, based on the existing data, there are no predictable synergies or changes in mechanism or mode of action of toxicity that suggest that a mixture of these two materials would present a different hazard profile.

2. *Robust Summaries for DETA and MIBK data addressing SIDS endpoints.*

One comment suggested that robust summaries should be prepared for all DETA and MIBK data related to the SIDS endpoints. As described in the Test Plan, both of these materials have been evaluated in the OECD Program and robust summaries of the data are readily available in IUCLID format. Additionally, both of these materials were originally sponsored in the USEPA HPV Challenge Program and the commitments subsequently transferred to the ICCA HPV Initiative. These materials are currently in process in that initiative. Discussion with the EPA HPV office supported our view that preparation of Robust Summaries for these materials would be redundant and this effort is not necessary to meet the goals of this program.

Please send an electronic acknowledgement of receipt of these documents to James Barter at barter@ppg.com.

If you have any questions, please do not hesitate to contact me.

Yours truly,

James A. Barter, Ph.D.
Director, Environmental Health Sciences & Toxicology